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Attorney for Defendant
WASTE MANAGEMENT OF ALAMEDA COUNTY, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE, a non-profit
corporation,

Plaintiff,

vs.

WASTE MANAGEMENT OF ALAMEDA
COUNTY, INC., a corporation.

Defendant.

Case No. 3:08-cv-03497-SC

SECOND STIPULATION CONTINUING
DATE ON WHICH TO EXCHANGE
INITIAL DISCLOSURES; [PROPOSED]
ORDER THEREON

Judge: Hon. Samuel Conti

1 WHEREAS, Plaintiff California Sportfishing Protection Alliance served the Complaint in
2 this action on Defendant Waste Management of Alameda County, Inc. (“WMAC”) on September 4,
3 2008;

4
5 WHEREAS, Defendant filed its answer in this action on September 30, 2008;

6
7 WHEREAS, the parties filed a joint case management conference statement on November
8 13, 2008;

9
10 WHEREAS, both before and after the filing and service of the Complaint, the parties have
11 engaged in and are continuing to engage in discussions and negotiations to fully resolve this matter
12 and have made significant progress on a potential settlement;

13

14 WHEREAS, the parties would like to continue to focus their efforts on settlement
15 discussions instead of preparing initial disclosures which may become unnecessary should the
16 parties reach a resolution;

17

18 WHEREAS, the parties appeared at the Initial Case Management Conference on November
19 21, 2008 and represented to the Court that they were making good progress toward settlement;

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21 WHEREAS, the parties agreed to extend the date upon which to exchange initial disclosures
22 from December 5, 2008 to January 9, 2009;

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1 THEREFORE, IT IS HEREBY STIPULATED by and among Plaintiff California
2 Sportfishing Protection Alliance and Defendant Waste Management of Alameda County, Inc. that
3 the parties shall have to and including January 9, 2009 to exchange initial disclosures.
4

5 Dated: December 2, 2008

Respectfully submitted,
6 LOZEAU DRURY LLP

7 By: _____ \s\

8 DOUGLAS J. CHERMAK
9 Attorneys for Plaintiff
10 CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE

11 REED SMITH LLP

12 By: _____ \s\

13 JULIA C. BUTLER
14 Attorneys for Defendant
15 WASTE MANAGEMENT OF ALAMEDA
COUNTY, INC.



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ORDER

Pursuant to Stipulation, it is so ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE